

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**

THOMAS MATTHEWS, ON BEHALF OF
HIMSELF AND OTHERS SIMILARLY
SITUATED

Case No. 1:24-cv-1550

Plaintiff,

vs.

SENIOR LIFE INSURANCE COMPANY

and

DANIEL SWISA

Defendants.

**JOINT MOTION TO EXTEND DEADLINES
CONCERNING RULE 16 CONFERENCE**

Plaintiff and Defendant Senior Life Insurance Company (“SLIC”), by and through their undersigned counsel, jointly move the Court for an order extending the time for the deadlines concerning the Rule 16 conference. In support of this motion, Plaintiff and SLIC state as follows:

1. The Rule 16 conference is presently set for August 6, 2025, at 11:00 A.M. per the Court’s July 11, 2025 Order.
2. On July 21, 2025, SLIC filed a Third-Party Complaint against Brendon Thomas, Mega Insurance Partners Inc., and Superior Insurance Marketing Inc. (“Third-Party Defendants”). SLIC is in the process of serving the Third-Party Defendants.
3. On July 24, 2025, counsel for Plaintiff and SLIC conducted their Rule 26(f) conference. Counsel discussed that, given that the case has expanded, they believe that efficiency dictates that the Rule 16 conference and its related action items, including the development of a discovery plan, involve the Third-Party Defendants.
4. Therefore, Plaintiff and SLIC respectfully request that the Court extend the time for the Rule 16 conference by 90 days to allow for service of the Third-Party Defendants and their responses to the Third-Party Complaint, as well as their input on the discovery plan. Consequently, Plaintiff and SLIC respectfully request that the Court extend all of the associated deadlines included in its July 11, 2025 Order by 90 days as well. However, to ensure that this case moves forward in a timely fashion, the parties have commenced discovery and will continue to engage in discovery during the extension.

WHEREFORE, Plaintiff and SLIC respectfully request that the Court extend the Rule 16 conference and all associated deadlines set forth in its July 11, 2025 Order by 90 days.

Dated: July 28, 2025

PLAINTIFF, on behalf of himself and others similarly situated,

/s/ William Robinson

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